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REMARKS

Claims 1, 3 – 11 have been rejected under 35 USC 103(a) as being unpatentable over the admitted prior art in view of Reid, et al. (United States Patent No. 5,810,406).

Claim 1 has been amended to more particularly point out and distinctly claim the subject matter that Applicants regard as their invention. Specifically, claim 1 has been amended to make clear that the first and second trim parts are not themselves otherwise in contact and are not adhered to one another, except through the bead of buffer material. Support for such limitation can be found at page 10, lines 23-38 which recite that the mating surfaces of the trim parts are separated by a generally uniform gap. In addition, support can be found at page 12, lines 11-13, which recites that the subject bead is sandwiched and compressed between the respective mating surfaces of the otherwise non-contacting trim panels. In addition, attention is directed to FIG. 3A which clearly illustrates that the trim parts are not themselves in contact and are not adhered to one another, and are separated by a gap, filled with the buffer material. Accordingly, no new matter has been entered by the present amendment to claim 1.

Applicant's invention is directed at a method of reducing noise in automotive trim panels caused by the relative movement of one peripheral edge of one component against an edge of an adjacent component. The method comprises forming a **recess in one peripheral mating edge or surface, overfilling** that recess with buffer material and allowing the buffer material to solidify, thus providing a mechanical die-lock to the

peripheral edge having the recess. This is followed by supporting the first and second trim parts adjacent one another with the trim part contacting the overfilled portion of the bead of buffer material such that the overfilled portion of the bead is **compressed** between the first and second trim parts at their peripheral edge. The first and second trim parts **are not themselves in contact or adhered to one another.**

In contrast, the cited art Reid et al. (United States Patent No 5,810,406) is directed at quite a different objective, and does not mention the feature of the presently claimed method to reduce noise between adjacent interior vehicle trim parts. Reid also does not teach or suggest the placement of a buffer material within a recess, at the peripheral edge of a first and second trim part that are not themselves in contact with one another, nor the use of compression of the bead between such first and second non-contacting trim parts.

Reid et al claims a molding such as might be mounted on the outside of a vehicle (see FIG. 1). The molding is comprised of two layers, a first having a plurality of lugs and recesses and a second extruded in association with the first and including a surface having a plurality of corresponding lugs and recesses, and means for attaching said molding to a substrate. It is clear that Reid et al is therefore not directed at **reducing relative movement and resultant noise** by adding a buffer bead in a recess between non-contacting **interior trim** components at **the peripheral edge** of such components. Reid et al's lugs and recess are across the entire surface of the parts, and are not limited to any sort of peripheral edge location.

This is not to suggest that Applicant fails to appreciate that the Examiner was of the opinion that Reid et al teach extruding a first layer of an automotive trim part and feeding the first layer into a shaping die such that the first layer has a recess with an undercut portion therein and using a mechanical bond as opposed to adhesive tape to

mate two materials to form an automotive trim component. See Office action of July 17, 2002 at page 3.

Applicant also does not dispute the fact that FIG. 2 of Reid et al appears to disclose a typical tongue and groove type attachment. Interestingly enough, the fact is that in the final analysis, Reid et al does not actually teach just a simply mechanical tongue and groove type engagement. Specifically, Reid et al promotes the requirement that lugs and recesses must also engage and preferably form an **adhesive bond**. See, column 3, l. 49-54 and claim 1 of Reid et al.

In any event, it is important to now emphasize that as recited herein, Applicant now claims that there is no **contact between the first and second trim parts** and further relies upon the use of **compression between the first and second trim parts such that a bead is compressed between a non contacting peripheral edge of the first and second trim parts** to reduce noises otherwise produced by contact and relative motion. In addition, the **peripheral edge of the trim part selectively contains a recess** and it is recited that one **overfills such recess** to provide the bead of buffer.

It is believed that Reid et al. in combination with the admitted prior art does not teach or suggest anything close to these combined limitations of the amended claims.

First, looking at either FIG. 2 or 3 of Reid et al, which is representative of the teachings therein, no peripheral edge of a first and second trim part can be seen at all, much less the selected incorporation of a recess at a peripheral edge and the filling of such peripheral edge recess with buffer to the point of overfill. Accordingly, there are no first and second non-contacting trim parts seen in Reid et al, in compression, at a peripheral edge, through a bead of material. In fact, Reid et al, if anything, illustrates that the lugs and recesses (and first and second layers) are in tension, across the entirety of the

part to the extent that the strip 14 or 114 is illustrated as freely hanging on the outside of the vehicle.¹

Applicant notes that in the Office Action of December 2, 2002 the Examiner correctly acknowledged that Reid et al did not teach compression. However, the Examiner suggested that compression of a buffer material held within a recess at a peripheral edge was taught in the admitted prior art at page 1-3 of the present application. This requires careful consideration of pages 1-3 of the specification.

Page 1 of the present specification pointed out that buffer material in the form of flat adhesive-backed tape had been used in the mating surfaces (without a recess) of trim parts. The present invention does not involve the use of adhesive tape.

Page 2 of the specification pointed out that buffer material was extruded onto flush mating surfaces (i.e. mating surfaces **without** a recess overfilled with buffer) and that it was therefore difficult to adhere such elastomers to the mating surfaces of all of the various trim assemblies manufactured (PVC, PP, PC/ABS, BS, paint, wood, textiles, etc.). Page 2 also referenced U.S. Pat. No. 3,635,117 which was directed to a method of fixing a ring to a woodwind musical instrument, by the use of an adhesive between the ring and woodwind instrument. Page 3 then went on to introduce the subject invention.

Accordingly, and in sum, the prior art disclosed adhesive tape, a buffer material that would not adhere to the various trim assemblies in production, and how to secure a ring to a woodwind instrument.

Or, stated another way, it is not believed that the admitted prior art, taken together

¹ In that sense, Reid et al actually teach away from the present invention. That is, as Reid et al teach the use of a lug and recess to hold parts together that will otherwise be in tension, no one skilled in the art could reasonably be led to believe that Reid et al teach the use of lugs and recesses, selectively located at a peripheral edge, and in compression. One skilled in the art, understanding Reid et al, would conclude that placing Reid et al's lugs and recesses, in compression, would amount to a complete waste of their engagement function. Accordingly, in the final analysis, Reid et al teaches away from the invention recited in amended claim 1.

with Reid, teach **compressing** a bead between otherwise **non-contacting peripheral edges** of two trim parts, wherein the peripheral mating **edge** of the first trim part is strategically configured to include a **recess with an undercut portion that is overfilled with buffer**. Such combination of features is simply and definitively not present in Reid et al, taken together with the admitted prior art disclosed in the specification at pages 1-3, and it is believed therefore that claim 1 is in condition for allowance.

Included herein is a marked copy of the amended claims showing the changes made.

It is respectfully submitted therefore, that the rejection of claim 1 under USC 103(a) as being obvious, should be withdrawn upon reconsideration. Claims 3-11 depend directly, or indirectly, from independent claim 1 and must be construed to include all the limitations of claim 1. Accordingly, claims 3-11 are believed allowable to their own additional limitations. It is respectfully submitted therefore, that the rejection of claims 3-11 under 35 USC 103 as being unpatentable should also be withdrawn upon reconsideration.

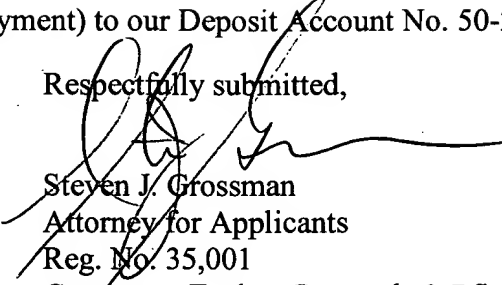
In consideration of the amendments to the claims and the remarks hereinabove, Applicants respectfully submit that all of the objections and rejections raised by the Office Action, mailed December 02, 2002 have been overcome by this response, and have been rendered moot. Accordingly, all claims currently pending in the application are believed to be in condition for allowance. Allowance at an early date is respectfully solicited.

In the event the Examiner deems personal contact is necessary, please contact the undersigned attorney at (603) 668-6560.

In the event there are any fee deficiencies or additional fees are payable, please

charge them (or credit any overpayment) to our Deposit Account No. 50-2121.

Respectfully submitted,


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CERTIFICATE OF MAILING

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By


Dana Robertson

MARKED COPY OF THE AMENDED CLAIMS SHOWING CHANGES IN
US 09/322,585

1. (Five Times Amended) A method [for mounting interior vehicle trim parts] to reduce noise between adjacent interior vehicle trim parts in which a first trim part is supported adjacent a second trim part and in which a bead of buffer material is provided between the first and second trim parts to reduce noises produced by contact and relative motion between the first and second trim parts, the method including the steps of:

providing the first and second trim parts, the first trim part having a peripheral mating edge configured to lie adjacent a peripheral mating edge of the second part when the first and second trim parts are supported adjacent one another and wherein said first and second trim parts are not in contact and are not adhered to one another;

forming a recess having an undercut portion in the peripheral mating edge of the first trim part after providing the first trim part;

providing buffer material in the recess and overfilling said recess so as to provide a bead of buffer material on the peripheral mating edge of the first trim part;

allowing the bead to mechanically connect to the first trim part by hardening of the buffer material within the recess; and

supporting the first and second trim parts adjacent one another with the second trim part contacting the bead of buffer material such that the bead is compressed between the first and second trim parts.

7. (Twice Amended) The method of claim 1 in which the step of providing buffer material includes the steps of:

providing a robot operatively connected to an applicator;

connecting a source of buffer material to the applicator, the buffer material being

in fluid communication with the applicator; and

operating the robot to move the applicator in spaced generally parallel relationship with the peripheral mating edge of the first trim part while projecting buffer material into the recess and onto the [peripheral] mating edge of the first trim part.

11. (Twice Amended) The method of claim 1 including the additional step of [mounting] locating the second trim part in an opening in the first trim part, the mating edges being an outer peripheral edge of the second trim part and an inner edge of the first trim part surrounding and defining the opening in the first trim part, the additional step following the step of allowing the buffer material to mechanically connect to the first trim part.